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Attorneys for Plaintiff EVGENIA PEKELNY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EVGENIA PEKELNY,)	Case No. 19-cv-05617-KAW
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	DISMISSING ACTION WITH
)	PREJUDICE
vs.)	
)	
EDEN MEDICAL CENTER, et al.)	
)	
Defendants.)	
)	

1 EVGENIA PEKELNY (“Plaintiff”) and EDEN MEDICAL CENTER and
2 SUTTER HEALTH (collectively, “Defendants”) stipulate through their undersigned counsel,
3 and respectfully request that this Court dismiss this action in its entirety with prejudice pursuant
4 to Fed. R. Civ. P. 41(a)(1)(A)(ii) or Fed. R. Civ. P. 41(a)(2), with each side bearing their own
5 attorney fees, costs, and litigation expenses. The parties also request that the Court retain
6 jurisdiction over their settlement agreement, pursuant to Paragraph 9 of General Order No. 56,
7 until October 31, 2024.

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10
11 Respectfully submitted,

12 Dated: December 20, 2022

13 /s/ Irakli Karbelashvili
14 Irakli Karbelashvili, Attorney for
Plaintiff

15 Dated: December 20, 2022

16 /s/ Kurt Franklin
Kurt Franklin, Attorney for
Defendants

17
18 **Filer’s Attestation**

19 I, Irakli Karbelashvili, attest that I received concurrence from the signatories in the filing
20 of this document.

21 /s/ Irakli Karbelashvili
Irakli Karbelashvili

[PROPOSED] ORDER

Having reviewed the parties' stipulation, and good cause appearing, this action is dismissed in its entirety with prejudice with each side bearing their own attorney fees, costs, and litigation expenses. The Court retains jurisdiction over the parties' settlement agreement until October 31, 2014.

IT IS SO ORDERED

Dated: _____

United States Magistrate Judge